

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Review of the Commission's)
Broadcast and Cable Equal) MM Docket No. 98-204
Employment Opportunity Rules and)
Policies)
and)
Termination of the EEO) MM Docket No. 96-16
Streamlining Proceeding)

TO THE COMMISSION

COMMENTS OF EEO SUPPORTERS

VOLUME III:

STATEMENTS OF WITNESSES

RECEIVED

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Of Counsel:

Kathleen Hawkins Berkowe, Esq.
Shelby D. Green, Esq.
Moushumi M. Khan, Esq.
Anne HaLarear M. Piper, Esq.
Rebecca Tabb, Esq.
Mary C. Williams, Esq.

David Earl Honig
Minority Media and
Telecommunications Council
3636 16th Street N.W., Suite AG-34
Washington, DC 20010
(202) 332-7005

Counsel for:

Scholars and Students:

Fatima Fofana
Nicolaine M. Lazarre
Dr. Audrey J. Murrell
Kay Pierson
Jen Smith
Kenya Stevens

Minority Media and
Telecommunications Council
African American Media Incubator
Alliance for Community Media
Alliance for Public Technology
American Civil Liberties Union
Black College Communications
Association
Civil Rights Forum on
Communications Policy
Cultural Environment Movement
Fairness and Accuracy in
Reporting
League of United Latin American
Citizens
Mexican American Legal Defense
and Education Fund, Inc.
Minority Business Enterprise Legal
Defense and Education Fund
National Asian American
Telecommunications Association

[list of commenters continued]

[cover page, continued]

National Asian Pacific American
Legal Consortium
National Association of Black
Owned Broadcasters
National Association of Black
Telecommunications
Professionals
National Association for the
Advancement of Colored People
National Association of Black
Journalists
National Bar Association
National Council of La Raza
National Hispanic Media Coalition,
including its Los Angeles, New
York, Chicago, Tucson,
Albuquerque, Phoenix and San
Antonio Chapters
National Latino Telecommunications
Taskforce
National Urban League
People for the American Way
Project on Media Ownership
Puerto Rican Legal Defense and
Education Fund
Rainbow/PUSH Coalition
Telecommunications Advocacy
Project
Telecommunications Research and
Action Center
Women's Institute for Freedom of
the Press

March 19, 1999

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*/ By providing her statement for inclusion in Volume III, a witness is not manifesting that she or her company has taken a position on the proposals in the NPRM or on the arguments made by the EEO Supporters in our Comments.

EXHIBIT 1

Alonzo

I, Alfredo ~~Alonzo~~, respectfully state as follows:

I am President and CEO of Mega Communications Incorporated. I am providing this Declaration in support of the proposed regulations regarding EEO enforcement.

I've been in the radio industry since 1978, starting at a Tampa radio station, where I served as an on-air personality and program director. Since that time, I have held positions in several markets as program director, general manager, and Vice President of Operations for Spanish Broadcasting System. Most recently I served as President and CEO of Mega Communications Incorporated.

I believe that the FCC's EEO program provides opportunities to minorities where they wouldn't otherwise have been extended. Minorities are usually cast to work for only minority formats, such as Spanish or Urban Contemporary formats. With the EEO, minorities had opportunities outside of the nitch formats.

The main reason for EEO policies is to recognize that there is talent within minority communities available to work in the broadcast media business. I think that minorities are looked at as "just" on-air talent. A minority job applicant is presumed qualified to only serve as a personality, such as a disc jockey, morning drive or afternoon drive person. It's perceived that we really don't have the qualifications to go up the ladder to become program managers or general managers. The company, in order to extend an administrative opportunity to a minority, would need exceptional proof that minorities are applicants that are qualified to advance.

The FCC EEO regulations are an initial step, but the old boy network prevails for the meaningful jobs. The FCC should do more than what it's done in the past. Also, training and mentoring for minorities is not yet where it should be. There are many stations and broadcasters that still have a bias against hiring minorities. It is difficult to recruit and retain minorities in the broadcast industry, and, office positions are still very difficult for us to attain.

The FCC has to become more visible so that minority applicants know that they have to be given a fair opportunity. I sense that minorities feel it is useless to apply for a position within broadcasting because they will not be hired. Applicants have to be more aware that EEO regulations are or were rules that were enforced by the government.

I started my career in broadcasting in an entry-level position and I know of many others similarly situated. For example, I know of a Hispanic male who started out as a disc jockey and an assistant at a radio station in San Jose. He is now Vice-President of Programming for Z Spanish Network. I know of another such person who started out at an entry-level position, as an assistant/gopher type person. He is now Vice President of Programming for Spanish Television. These broadcasters, starting in entry-level positions, represent a significant percentage of broadcasters who are now in high-level positions.

Station ownership is important for minority entry into the media. The price of broadcast stations have gotten out of hand. The larger broadcasters own everything and financing is very difficult to get. In the markets where minorities can make money, like in urban areas, the established broadcasters like Chancellor, Clear Channel and Infinity, are using minority formatted stations. This makes it very difficult for minorities to get into ownership and make money.

In addition to a solid business education and networking, on-the-job training is needed to develop an owner's skill in hiring, handling a media campaign and programming. It is very important to financial institutions that a prospective owner have broadcasting experience. Lack of FCC EEO enforcement will definitely hurt minorities' chances to get into media ownership, because they may not be able to get the proper opportunities for networking and on-the-job training. FCC EEO enforcement would facilitate a minority individual to learn more about the industry.

Mentoring and training opportunities are important. In my own company, most of my general managers don't have extensive experience in the broadcast industry. Since I am a small company, I often have to recruit people, with strong management skills, from other industries. These managers had to learn the broadcast business on the job. In programming, I've taken people out of on-air positions and really mentored them in regards to programming a radio station. We've done a good job in offering minorities growth opportunities that other companies may not allow. Some companies are providing mentoring and training for minorities, but on the whole, most companies try to hire people who already have positions in the industry. This practice really limits the ability of minorities to enter the broadcast industry.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed

3/1/99

A handwritten signature in black ink, appearing to be 'Alfredo Alonzo', written over a horizontal line.

Alfredo Alonzo

EXHIBIT 2

I, Thomas Castro, respectfully state the following:

I am providing this Declaration in support of the proposed regulations regarding EEO enforcement.

I have been a broadcast station owner since 1979, having brought an interest in a daytime radio station in Phoenix, Arizona. After its sale, in 1981, my partner and I purchased an interest in an AM station in the Riverside, San Bernardino market, where I served as general manager for six years. We were the first Hispanic broadcast owners in the Phoenix and in the Los Angeles markets. We formed a partnership to obtain a big FM signal in Los Angeles, a new license the FCC was issuing. Ultimately, I created Eldorado, and over the last five years, we've owned 11 different properties, including Houston, Los Angeles and Dallas.

The FCC regulatory program is still necessary because this is an industry that is rather insular and people hire those they know have worked with in the past and trust. The problem is that we are dealing with public airways and public trust. If employment decisions function within a closed world, then a new person, and especially those of us who have been kept out of opportunities over the years, would be operating outside a closed system. The only real way to force change is to monitor the progress of broadcast owners and managers to integrate their work force. You can't have a radio and television station without the government first giving you a critical public resource. So enforcement of FCC regulations is essential and it shouldn't be just paperwork to be filled out, but must accompany strong standards.

Having an EEO program would allow a broadcaster, without a perfect or diverse human resource network, to do outreach and bring more talent to their company. An effective EEO program could create access to an untapped pool of talent. For example, that person might bring with them resources that the owner is not tapping. It can only be a winning situation for everyone.

A major concern for broadcasters is that they will have to "lower their standards" to hire minorities. This is unfounded. There is a lot of talent within our diverse communities. When broadcast managers and executives hire friends and relatives, they are taking on faith that the employment decision will work out okay. Though the new hire probably doesn't have many skills, the broadcaster is

comfortable with the individual who made the referral. Limited access for women and minorities is just a fear of the unknown, but there is no lowering of the standard.

FCC EEO regulations have been effective, but could be more effective if many broadcasters would do more than minimally comply in order to seek a safe harbor. However, minimal compliance with EEO regulations has still created opportunity. Most positions get filled so fast, that if a person does not know someone in the industry, without the outreach efforts, including notification, you are never going to find out about job openings. A promising person who is known by somebody, who knows the decision-makers, usually fills entry-level positions. Minorities are generally not wired into that network of people. Unless there is an open notice, minorities are not going to know about job openings.

The only way to learn broadcasting is to be in the industry. To become a skilled person in the industry, you have to be given an opportunity to sharpen your skills. This is true for on-air talent, administration and in sales. On-the-job training is necessary to provide mentoring and the chance to work with highly skilled people.

FCC EEO enforcement creates upward mobility, because broadcasters have a score card that they know will be evaluated annually by the. Companies figure out a way to make sure there are enough minorities and women in management positions. Without this enforcement, I fear there would be a reversion to the good old boy network. To quote Jesse Jackson, "people hire and do business with people they trust." In most of the stations the owners and managers are white men and they don't know and trust many people who are not like them. They know a lot more minorities then they did, say, ten years ago, but still do not know many minorities. Recruitment can be difficult in large and small markets because people just don't know each other across racial and community lines. Recruitment can be a challenge if you are relying on peers or relationships for referrals.

FCC EEO regulations have impacted my career. I would not have been in this industry if the government did not put out the welcome mat by specifically

stating that minorities could, should and will own stations and hold jobs in the industry.

I became interested in broadcasting when the FCC issued its report, in 1977, which quantified the abysmal ownership of minorities in television and radio. The government created the minority tax certificate, new licenses were available, and an attempt was made to integrate the industry on the ownership and on the employment level. The tax certificate helped me get into broadcasting, though the biggest beneficiaries were the broadcast station sellers. For every benefit I got, the sellers received a ten-fold benefit. The sellers actually received the tax certificate and were able to defer their taxes, and they were all white men who owned the stations that were sold to minorities, under the tax certificate program. On the employment side, the government caused people to think of and to reconsider employment within the industry. The FCC EEO enforcement in the late 70s and 80s was a stimulus to get into the industry. However, in the 90s, the word has filtered through to young people that if they don't know someone in the industry, it is back to the way it used to be.

While the FCC regulations helped initially, I think we have gone in reverse of late. It is likely that 90% of the minorities, under 50 years of age, obtained positions in the broadcast industry due to affirmative action. In my company, we hired a young Hispanic woman as an account executive who, within three years, is earning in the six-figure range and has been hired by ABC. I know of a very talented Hispanic award-winning programmer hired by a non-minority broadcaster that needed someone to work within the Hispanic community. This programmer is now a very successful broadcaster and part owner in my company. I know of a man, now the deputy editor of the Los Angeles Times, who won a fellowship for journalist at Harvard and a Pulitzer Prize, who was an affirmative action hire at the Los Angeles Times 25 years ago. At that time, there were only two Hispanics on a staff of probably 800 in a city that was 25% Hispanic.

Over the years, many minorities have moved into positions of leadership. Oprah Winfrey, would likely have been hired in broadcasting, without affirmative

action, because she is so talented and aggressive. However, she probably wouldn't have been given the big opportunities she has been given. Once given the opportunity, look what she's done with it.

I have found that people who work within broadcast stations without effective EEO programs have had fewer opportunities and are less satisfied. FCC EEO policies are needed to level the playing field. These regulations are not perfect and have been criticized. You can poke holes at the FCC regulations, but at the end of the day, it's the best thing we've got.

The portrayal of issues, by the media, is directly related to who is sitting around the table deciding what to cover and how to cover it. Different people bring different perspectives to the table, the good and the bad of our life experiences. News and public affairs are biased in favor of the values and life experiences of the people who control it.

There is a direct linkage between integrating the work force and the product that goes on the air. For example, minority teenagers are seen as a threat to society by a lot of non-minorities. Clearly, people that control the media, bring their own biases to the party. There is a basic assumption with non-minority broadcasters that many problems exist within the minority community. An interracial media staff is necessary to tell a facet of great stories that, otherwise, may never be told. The good thing about the media is that it is not as hierarchical as other industries. Any employee, with a good idea for a story, has a good chance of getting attention. Injecting people with different life experiences, even at the lower levels of the organization, initially, can help a media organization to perform its public duty better.

Before deregulation, lack of minority ownership was primarily due to lack of capital. Now, access to capital is still problematic, but in addition, most media properties have been gobbled-up by a hand-full of maybe ten companies, never to come up for sale. These properties are traded between large owners. If you don't own a lot of stations, you have no trade base. So like in the game monopoly, what good is money if you can't buy real estate? In this case, real estate is a license and the owners are those who had access to capital, which did

not include minorities. So when deregulation came, the non-minorities were able to get money to buy up all the stations.

If an owner does not have on-the-job training and opportunities, you will not make it. Without broadcast management experience, you will never get a penny from the banks to purchase a station, unless you are very wealthy and have sufficient collateral. The greatest percentages of opportunity minorities have to become managers, and thus qualifying later to become owners. Minority owners would disappear if FCC EEO enforcement disappears.

Many formal opportunities for mentoring have disappeared or been cut back significantly. The industry should do infinitely more, on a volunteer basis, to mentor and support.

There is a vicious cycle that only the media can break, which affects ownership and employment. But it also affects non-media employment and business opportunities. If the media is spewing a steady stream of negative and inaccurate images about minority communities, then that directly impacts what decision-makers are willing to do as far as giving minority people opportunities. I believe the FCC should measure the social damage caused by broadcast companies, who broadcast negative stories. These companies are building their news ratings on the backs of minority people, gays and women. So much so, that berating minorities and women is now acceptable and very lucrative in America.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed 3/15/99


Mr. Thomas Castro

EXHIBIT 3



WKBW-TV, Buffalo
KNTV, San Jose
WPTA-TV, Fort Wayne



KEYE-TV, Austin
WTVH-TV, Syracuse



KSEE-TV, Fresno-Visalia
WEEK-TV & FM, Peoria-
Bloomington
KBJR-TV, Duluth-Superior



WDWB-TV, Detroit
KBWB-TV, San Francisco-
Oakland-San Jose

I, W. Don Cornwell, respectfully state as follows:

I am Chairman and Chief Executive Officer of Granite Broadcasting Corporation, owner of ten television stations serving communities ranging in size from Duluth, Minnesota to San Francisco, California. I am providing this Declaration in support of the proposed regulations regarding Equal Employment Opportunity ("EEO") enforcement.

I represent the views of myself and a cross-racial group of managers within my company who have many years of operating experience in the broadcast industry. My company commenced operations approximately ten years ago when we acquired our first stations serving the communities of Duluth, Minnesota and Peoria, Illinois. Prior to that, I was an executive for seventeen years with the investment banking firm of Goldman, Sachs & Co.

I believe the regulatory program of the Federal Communications Commission ("FCC") is of value because our nation and industry is still far from having a level playing field. EEO regulations serve as a strong reminder that broadcasters must treat employees fairly and make an effort to be inclusive in hiring.

In addition to the fact that inclusion in hiring is the right thing to do, it is also good business. We live in a country that is rapidly becoming more diverse in population—much more so than the Founding Fathers would have ever imagined as they framed our Constitution. In fact, I doubt anyone would have been farsighted enough to envision the extent of racial diversity we have in the United States today. In advertising supported media such as local television where the size of audience is critical, managers must be sure to reach out to as large an audience as possible. That clearly argues for an inclusive approach in programming as well as employment.

It is important to remember that word of mouth recruitment is very significant in the broadcast business. Intern and part-time positions are many times filled through in-house referrals and when full time positions become available, these "known" workers typically lead the recruitment list. Thus, if a company is not ethnically diverse at the outset, the word of mouth process can be detrimental to minorities seeking the new full time

jobs. Because of this phenomenon, the FCC's EEO policies also motivate companies to put special effort into training and mentoring their minority employees in order to improve retention and make the recruitment process easier in the future.

I know that it is sometimes difficult to recruit minority candidates to certain locales—smaller towns, for instance. However, we have had success in our company in communities as small and cold as Duluth, Minnesota. Thus, it is clear to us that one can be successful if one is willing to make the effort. Our managers have done just that.


I continue to believe that the broadcast industry must focus more on the entry level position as a means of increasing the level of employment diversity. Virtually the entire top operating managers in my company got their start through an entry level position. Thus, we have attempted, from the very beginning of the company, to provide such opportunities to aspiring but inexperienced broadcasters. Some have remained and advanced with our company while others have moved on to successful careers with other companies. We have also contributed financially to programs sponsored by others that make such opportunities available at levels ranging from high school to college. Thus, we believe that to the extent EEO policies motivate companies to support such intern and entry level positions, diversity will increase in the industry over time.

One side benefit of employment diversity may be content diversity since the interests an individual brings to the job will undoubtedly be reflected in the approach taken to a story or a project. In our experience, this is reflected in one of our news anchor in Peoria—an African American—who consistently finds a way to introduce that largely Caucasian community to more about the relatively small African American community in Central Illinois than it might have learned otherwise. It can also include the more dramatic efforts of a Bob Johnson, major shareholder of Black Entertainment Television, deciding to take an active role in urging his audience to vote in recent elections. All of these actions result from the personal focus of an individual. All employees of whatever racial background make such choices every day and, to the extent we have diversity in the workforce, we are likely to see that diversity of experience reflected in the programming choices of stations.

Finally, I would conclude by saying that having the FCC use its "bully pulpit" to set a tone for the industry in this area is entirely appropriate and helpful. It encourages not only small companies like Granite but also reminds the leaders of major media entities to re-examine their own efforts. In that respect, the Commission is to be applauded for having placed this issue high on its agenda.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed _____



W. Don Cornwell

EXHIBIT 4

Declaration of Veronica Cruz

I Veronica Cruz, respectfully state as follows:

I oversee a television production company, and work in feature productions and transactions for a large broadcasting network based in Los Angeles. I have personal experience with EEO because I gained my entry into broadcasting through a special internship program offered by a large broadcasting company. This internship program gave me an opportunity to learn about career options in broadcasting. It allowed me to showcase my skills and abilities. It gave me the opportunity to succeed.

It was a little thread that affected many aspects of my career. I have gone on to a successful advancement in the broadcasting field due to this entry-level opportunity. Had I not been drawn into the foundation that gave me my internship at NBC, I would never have been aware that I could possibly be working for a broadcasting company. It probably would never have crossed my mind. I knew that I wanted to work in auditing and accounting, but I never entertained the thought of working within the broadcasting industry.

There is not an easy flow of information about opportunities for different minority groups. Often they are isolated by their cultural background and their schools. Unless there is a way to inform them of what they can do, they will not consider these

opportunities. It is atypical for someone in the first generation, like me, to be able to enter the mainstream. It usually takes a second or third generation, a little more cross-culturalization to happen before people can make it in society.

I also have experience on the impact of EEO from my observations as a mentor and counselor for upcoming minority broadcasting professionals, and as a part of the media consumer audience.

The EEO policy is important for its impact on programming offered by stations and for providing minorities with knowledge of entry level positions for which they are qualified. It has, to some extent reduced the reliance of word-of-mouth recruiting.

With any business it is important to understand your demographics and your viewership. For instance, there are quite a few minority groups that make up the L.A. market. For a broadcaster to be truly successful, it must be able to address the needs and concerns of the people in its market. Programmers cannot expect everyone to be excited or interested in just one viewpoint. A broadcaster which has EEO obligations and hires people who understand different perspectives is a little more attuned to minority concerns. As a result, the broadcaster can attract more viewership. It will have a tendency to grab a bit more of the market than a generic station; therefore, it will be able to be a little bit more successful than the average station.

In other words, EEO directly and indirectly affects the programming content offered by broadcasters. I remember sitting in on newsroom story sessions in which they tried to figure out the spin on a particular story. Because there weren't minorities, there wasn't that pool of information to give programmers an awareness of how their product was viewed in a particular community. Because personnel that understood the community were not available, the station found it difficult to come across with the right spin on the story.

I would sit on the assignment desk and field calls on the weekend and we would get a lot of phone calls from these viewers that had feedback on the stories. Depending on the community, most of the calls consisted of suggestions such as "you should talk to us in the community." Some viewers would ask why we had not spoken to people within the community to obtain the African American point of view, the Asian point of view, etc., or say that we "missed it totally."

The problem was that the staff planning these stories were people that were not in those ethnic groups and really had no idea what was missing in their communication, or what the thought process was supposed to be. When one broadcaster I worked for started to hire more Hispanic field reporters (the people that go out and get the information, conduct interviews, etc.) there was a noticeable difference. The reporting on some of the stories gained more depth and objectivity.

As with anything, positive changes in broadcasting take time, as well as a commitment to hire from broad cross segments of the communities served by broadcasters. I have noticed a definite increase in spin-offs of the standard newscasts that discuss issues that are important to certain communities.

EEO also has a subtle impact on career success for minority broadcasting professionals. As my career progressed, there were very few Hispanic role models available to me. It was disheartening from a mentoring standpoint, because there weren't that many people I could look up to as far as examples of what I'd hoped to achieve. That did not make me less of a hard worker, but, there is a positive effect to having mentors of the same culture and ethnic group, who have been able to surmount obstacles and might have a strategy as to how to deal with them.

In addition, many young people and freshmen employees try to fuel their advancement based on what they see ahead of them. If they do not see anything ahead of them to look forward to, they tend to want to give up. Non-minorities may not grasp that concept because it is something they can take for granted. When there is an absence of a role models, one realizes the impact. So now, I have been, and will be, the role model for others. Perhaps this will have a positive impact on their careers.

I know some broadcasters complain of a lack of interested applicants. This might actually be more of a function of their unwillingness to reach too far from their immediate neighborhoods in their hiring efforts. Most broadcaster's headquarters in affluent neighborhoods where there are few minority or low income people. If they tried to encompass all the communities or their audience, they would have no problems finding qualified minorities. The primary trouble is location and lack of effort.

The EEO program is a crucial aspect of broadcaster's public interest obligation and must not be reduced or weakened. It is important to have the regulations so that there is a little bit more of an equal spread of ethnic viewpoints.

Veronica J. Cruz

Veronica Cruz,

February 28, 1999.

EXHIBIT 5

DECLARATION OF DR. JANNETTE DATES

I, Dr. Jannette Dates, respectfully state as follows:

I am the Dean of the School of Communications at Howard University, and I also serve as Chair of the Black College Communications Association ("BCCA"). BCCA is composed of administrators and faculty in mass media programs at historically Black institutions of higher education.

I have been a teacher and administrator in mass media program for nearly 30 years. Among my published works is J. Dates and W. Barlow, Split Image: African Americans in the Mass Media (1993).

An EEO enforcement cutback would impose significant burdens on historically Black colleges and universities ("HBCUs"), Black broadcasting students, and Black broadcasting professionals.

All of the Black college broadcasting programs came into existence after 1971 -- in large part because the FCC adopted its EEO Rule. Howard University created the first such program that year. No such program existed before that, because unchecked discrimination in the industry was so extensive then that it would have been absurd for Black college administrators to promise Black college broadcasting graduates that broadcasting careers awaited them.

One of our primary objectives as educators is "mainstreaming our students. "Mainstreaming" means insuring that the students have access to state of the art equipment and broadcasting techniques, and insuring that the students do not artificially restrict themselves to working only at Black-formatted stations.

In order to fulfill this mainstreaming objective, each Black college broadcasting program relies heavily on internship programs at FCC-licensed facilities. A few broadcasters traditionally offer these programs voluntarily. Unfortunately, most do so only because it is an appropriate component of the EEO outreach the FCC required them to undertake. Thus, a cutback in FCC EEO enforcement will result in the disappearance of many of the best training opportunities presently open to Black broadcasting students. Inevitably, a cutback in internship opportunities will impose on the Black colleges considerable new burdens and costs attendant to providing in-house practicum experiences for their students.

Equal opportunity in broadcasting is still a fairly new concept. Most of those who entered the industry in the 1970's (the first decade of FCC EEO enforcement) have yet to attain ownership and senior management positions in broadcasting companies. Therefore, this year's class of Black college graduates still lacks access to any significant networking and alumni support from Black broadcasting managers with hiring authority. It will probably take another generation of strong FCC EEO enforcement before the networking opportunities typically enjoyed by students at predominately White institutions are available to students at HBCU's.

Even today, after a generation of FCC EEO enforcement, roughly two-thirds of the graduates of Black college broadcasting programs are still unable to find jobs in their chosen field. It is difficult to overstate the burdens on our graduates from a reduction in the already crabbed career opportunities available to them. Having devoted four years of hard work to securing a

broadcasting degree, Black broadcasting students have foreclosed to themselves the opportunity to enter a more traditional and "safe" field such as teaching. This career choice is not made lightly by any student: it is made in reliance on the FCC's promise that the broadcasting industry -- although virtually closed to Black people from 1920 to 1971 -- would open its doors and welcome us.

If Black colleges cannot, in good faith, hold out to our students that jobs might be available to them upon graduation, the very premise for the existence of Black college broadcasting programs will have evaporated. A reduction of opportunity for our graduates would threaten the existence of many Black college broadcasting programs and would significantly burden all of them. Even the surviving programs would have to commit far greater resources to recruitment and placement, thereby further straining the budgets of the colleges' academic programs.

Most Black college graduates begin their professional careers at "small" stations, such as those with fewer than ten fulltime employees, or in entry level positions at larger stations. Although our entering freshmen typically aspire to careers at large stations and in high-paying jobs, every broadcasting teacher at a Black college must repeatedly stress to students that these jobs are seldom available to recent college graduates unless the students are related to the owner or manager.

Black colleges' placement and alumni programs are specifically tailored to opportunities at "small" stations and to entry level positions at larger stations. Indeed, our advice to students is that they must be willing to sacrifice their social lives and be ready to go even to the most isolated communities in

-4-

the country to work after graduation -- if that's where the jobs are. We repeatedly emphasize to our students that they must start "small" and work their way up.

The FCC's EEO rule had been the single most critical factor in promoting equal employment opportunity for people of color in the broadcasting industry. Opportunities for Black students seeking to enter this business continue to be far too scarce, compared to opportunities for similarly situated and similarly educated white students. Consequently, the FCC should dramatically strengthen its EEO enforcement effort, and set a goal of eliminating discrimination from broadcasting, root and branch, in the near and foreseeable future.

January 21, 1999

Jannette L. Bates
Dr. Jannette Bates